

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p><b>GENOVA BURNS LLC</b> Daniel M. Stolz, Esq. Donald W. Clarke, Esq. dstolz@genovaburns.com dclarke@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>BROWN RUDNICK LLP</b> David J. Molton, Esq. Robert J. Stark, Esq. Michael S. Winograd, Esq. Eric R. Goodman, Esq. dmolton@brownrudnick.com rstark@brownrudnick.com mwinograd@brownrudnick.com egoodman@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801  and  Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p><b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467  <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>	<p><b>OTTERBOURG P.C.</b> Melanie L. Cyganowski, Esq. Richard G. Haddad, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. David A. Castleman, Esq. mcyganowski@otterbourg.com rhaddad@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com dcastleman@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 661-9100 Fax: (212) 682-6104 <i>Proposed Co-Counsel for Official Committee of Talc Claimants</i></p>

In re:

**LTL MANAGEMENT LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS  
TO DISMISS SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT, LLC**

**PLEASE TAKE NOTICE**, that *on May 22, 2023 at 10:00 a.m.*, the undersigned, as local bankruptcy counsel for the Official Committee of Talc Claimants (the “Committee”) of LTL Management LLC, (“LTL” or the “Debtor”), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of an order dismissing the Debtor’s Chapter 11 case, and for such other relief that is just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing and filed no later than seven (7) days before the hearing with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey

---

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

Respectfully submitted,

**GENOVA BURNS, LLC**

By: /s/ Daniel M. Stolz .

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

110 Allen Road, Suite 304

Basking Ridge, NJ 07920

Telephone: (973) 533-0777

Facsimile: (973) 467-8126

Email: dstolz@genovaburns.com

Email: dclarke@genovaburns.com

*Proposed Local Counsel to the Official Committee  
of Talc Claimants of LTL Management, LLC*